

IN THE DRAWINGS

The attached sheets of drawings include changes to Figs. 2 and 6. These sheets, which include Figs. 2 and 6, replace the original sheets including Figs. 2 and 6.

Attachment: Replacement Sheets

### REMARKS/ARGUMENTS

Favorable reconsideration of this application, as currently amended and in light of the following discussion, is respectfully requested.

Claims 1-36 are currently pending. The present amendment amends Claims 1-19, and 21-27, and adds Claims 28-36. The changes and additions to the claims are supported by the originally filed application. No new matter has been added.

In the outstanding Office Action, the drawings were objected to because of informalities. Claims 1-12 were rejected under 35 U.S.C. § 112, first paragraph, as failing to comply with the enablement requirement. Claims 1-27 were rejected under 35 U.S.C. § 103(a) as unpatentable over Danielson et al. (U.S. Patent No. 5,239,662, herein "Danielson") in view of Mendelson et al. (U.S. Patent No. 6,343,083, herein "Mendelson") and further in view of St-Pierre et al. (International Publication No. WO 98/37724, herein "St-Pierre").

In response to the objection to the drawings, submitted herewith is a Letter Submitting Replacement Drawings Sheets along with 2 Replacement Sheets for Figs. 2 and 6 modified as requested in the Office Action. Therefore, the drawings are now believed to be compliant. Accordingly, no further objection on this basis is anticipated.

In response to the rejection of Claims 1-12, under 35 U.S.C §112, first paragraph, Applicant respectfully submits that Claim 1 does not recite or claim a combination of two networks, as asserted in the Office Action, and therefore enables one skilled in the art to make or use the invention. Claim 1 originally recited "said first object being *one of* a mobile mobile telephone network, a wire-based telecommunication network, a cable television network, an Ethernet, and an electrical distribution network." The "and" was simply used to specify a list of networks from which *one* network is selected. This is a proper construct. However, in the spirit of moving prosecution forward for the present application, Applicant amended Claim 1 to clarify even further the invention. Specifically, amended Claim 1 recites

“said first object is one of a mobile telephone network, a wire-based telecommunication network, a cable television network, an Ethernet, *or* an electrical distribution network.”

Accordingly, it is respectfully requested that the rejection of Claims 1-12 under 35 U.S.C. § 112, first paragraph, be withdrawn.

In response to the rejection of Claims 1-27, as unpatentable over Danielson, Mendelson, and St-Pierre, Applicant respectfully requests reconsideration of the rejection and traverses the rejection as discussed next.

Claim 1, which is also representative of Claim 7, is directed to a communication device including: a central controller configured to establish a communication session between a first object and a second object, the first object employing a first communication protocol used in establishing a communication session with the central controller, the first object having a first adapter configured to translate between another communication protocol that is native to the first object and the first communication protocol, the second object having a second adapter, the second object employing a second communication protocol that is not compatible with the another communication protocol, wherein: the central controller includes a protocol coordination mechanism that compares attributes of different protocols supported by the first adapter and the second adapter when establishing the communication session between the first object and the second object; the central controller includes a database having a list of subscribers with associated calling numbers, the database hosting information associated with the calling numbers for different objects to which the subscribers belong; and the first object is a mobile telephone network, a wire-based telecommunication network, a cable television network, an Ethernet, or an electrical distribution network.

The Office Action states on page 3 that Danielson does not teach the “protocol coordination mechanism” and “database” features recited in Claim 1, but asserts that

Mendelson, further modified by St-Pierre, teaches these features. Applicant respectfully traverses that position.

Specifically, the Office Action states on page 4 that Mendelson teaches “an access network controller containing a cache of tables containing IP to MAC translation addresses and other parameters (Col 12 lines 26-59) pertaining to the networks (elements 112 and 110 in Fig 1)” and further asserts that “[t]he access network controller compares the parameters within the cache in order to translate the specified destination IP address to a corresponding destination address (Col 13 lines 12-15).” Applicant respectfully submits, however, that “compares the parameters within the cache” is not, in fact, taught by Mendelson.

The cited passage of Mendelson states that “[i]n step 516, the ANC 250 acts as an Internet ARP Server “IARPS”, using its own IP-to-MAC address translation cache if possible, and translates the specified destination IP address to a corresponding destination MAC address.”<sup>1</sup> This does not teach “a protocol coordination mechanism that *compares attributes* of different protocols supported by said first and said second adapter,” as recited in Claim 1. In fact, this does not teach *any* comparison. Mendelson simply uses a cache table to find a MAC address corresponding to an IP address. Looking in a table to find one or more elements of the table corresponding to a given address does not involve comparing, but rather merely retrieving some information stored in the table.

In other words, an address translation mechanism does not meet a protocol coordination mechanism. The former is a simple operation that can be accomplished by simply looking up in a correspondence table, as in Mendelson; the latter is a more sophisticated mechanism which, in particular and as recited in Claim 1, “*compares attributes* of different protocols.” Claim 7 was amended to recite this feature of Claim 1. Specifically, Claim 7 now recites “said central controller includes a protocol coordination mechanism that

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<sup>1</sup> Mendelson, column 13, lines 12-15. [Emphasis added.]

compares attributes of different protocols supported by said first adapter and said second adapter.”

The Office Action does not assert that St-Pierre teaches this feature of Claims 1 and 7 not taught by Danielson, as indicated in the Office Action, or by Mendelson, as discussed above. Accordingly, even if the combination of Danielson, Mendelson, and St-Pierre were assumed proper, Danielson, Mendelson, and St-Pierre, whether taken alone or in combination, do not teach “said central controller includes a protocol coordination mechanism that compares attributes of different protocols supported by said first adapter and said second adapter when establishing said communication session between said first object and said second object,” as recited in amended independent Claim 1 and similarly recited in amended independent Claim 7.

Claim 13, which is also representative of Claim 27, is directed to method for communicating between objects employing incompatible communication protocols, comprising: sending coordination information from a first adapter associated with a first object to a central controller; translating at the first adapter information formatted in a first native protocol used in a first object to a general protocol; receiving the coordination information at a central controller; identifying at the central controller communication attributes of the first adapter and the first object and attributes associated with a second object having associated therewith a second adapter and a second native protocol that is not compatible with the first native protocol; coordinating between the central controller, the first adapter, and the second adapter including: translating information sent from said first object in the first native protocol; and receiving said information at the second object in the second native protocol.

The Office Action states on page 6 that Danielson does not teach the “identifying at said central controller communication attributes of said first adapter and said first object and

attributes associated with a second object” feature of Claim 13, but asserts that Mendelson, teaches this features. Specifically, the Office Action asserts that Mendelson teaches that “[t]he access network controller compares the parameters within the cache in order to translate the specific destination IP address to a corresponding destination address.” Again, Applicant respectfully submits that this does not correspond to the claimed invention since Mendelson only looks up in a table a corresponding address, and does not do any comparison. However, Applicant notes that the word “comparing” was not used in original Claims 13 and 27 and that the sole use of the word “identifying” may be considerably more broadly interpreted. Thus, in the spirit of moving prosecution forward for the present application, Claims 13 and 27 are amended to recite “identifying and comparing” rather than “identifying.”

Therefore, in light of the above discussion and amendments, Applicant respectfully submits that independent Claims 1, 7, 13, and 27 (and all associated dependent claims) patentably define over Danielson, Mendelson, and St-Pierre. It is therefore respectfully requested that the rejection of Claims 1-27 be withdrawn.

Further, in order to vary the scope of protection recited in the claims, new dependent Claims 28-36 are added. The new claims find support in the originally filed application, for example at page 13, lines 2-4 and 21-29, and therefore do not add new matter. New Claims 28-36 further describe the above discussed limitation not taught by the Danielson, Mendelson, and St-Pierre references. Specifically, new Claims 28-30 depend from Claim 1 and specify features related to the protocol coordination, namely: a mechanism determining *how* a particular communication link should be established (which goes substantially beyond merely knowing *where* to direct the link, as in the prior art); a mechanism for analyzing candidate protocols and determining a most effective protocol for establishing the communication session; and a mechanism identifying, when an exactly overlapping language

is not available, protocols that are within a vocabulary of the first object and the second object and selecting a protocol that minimizes a translation burden to a router. New Claims 31-33 and 34-36 recite features similar to those of Claims 28-30 but depend from Claims 7 and 13, respectively.

Consequently, in view of the present amendment and in light of the above discussion, the outstanding grounds for rejection are believed to have been overcome. The application as amended herewith is believed to be in condition for formal allowance. An early and favorable action to that effect is respectfully requested.

Respectfully submitted,

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